

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE WORLD TRADE CENTER DISASTER	: 21 MC 100 (AKH)
SITE LITIGATION	: (All Cases)
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IN RE COMBINED WORLD TRADE CENTER	: 21 MC 103 (AKH)
AND LOWER MANHATTAN DISASTER SITE	: (All Cases)
LITIGATION (straddler plaintiffs)	:
-----X	

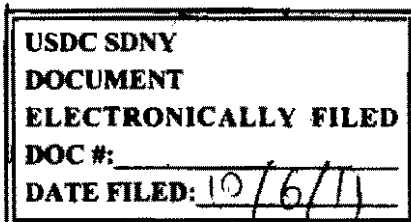


**NOTICE OF MOTION TO DISMISS CLAIMS AGAINST  
THE PORT AUTHORITY OF NEW YORK AND NEW  
JERSEY**

**PLEASE TAKE NOTICE** that on a day to be determined by this Court, Plaintiffs' Co-Liaison Counsel, Worby Groner Edelman & Napoli Bern, LLP, shall apply to the Honorable Alvin K. Hellerstein, U.S.D.J. at the Southern District of New York located at 500 Pearl Street, New York, New York, Room 14-D for Order seeking the dismissal of certain plaintiffs' claims against defendant The Port Authority of New York and New Jersey with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(2).

Dated: New York, New York  
October 4, 2011

/s/ Christopher R. LoPalo  
Christopher R. LoPalo  
Worby Groner Edelman & Napoli Bern, LLP  
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(212) 267-3700  
*Attorneys for Plaintiffs*



*The Court will hear  
Counsel on the motion  
of involuntary dismissals  
of derivative plaintiffs,  
on October 11, 2011,  
2:30 p.m.  
[Signature]  
10/6/11*